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December 22, 2020

VIA ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Giuffre v. Dershowitz*, Case No 19-cv-3377-LAP**
Joint Status Report

Dear Judge Preska:

In accordance with the Court's order at the November 24, 2020, status conference, the parties submit the following joint report:

Plaintiffs' Documents

Now that the Court has entered the parties' proposed agreed protective order, Plaintiff will produce the confidential materials she has gathered thus far, including emails that contain confidential information, financial records, and medical records, within the next few days.

Plaintiff will be prepared to produce her text messages and Facebook and WhatsApp messages once the parties have met and conferred concerning the parties' text and social media messages. The parties plan to meet and confer on January 5, 2021.

Defendant's Documents

Defendant anticipates substantially completing his production of responsive, non-privileged documents from his Gmail account (through the date of collection in April 2020) by approximately January 29, 2021. Defendant anticipates substantially completing his production of non-privileged non-email documents by that date, as well.

The parties continue to confer with the President and Fellows of Harvard College ("Harvard") concerning its response to the subpoena served by Plaintiff for, among other items, documents from Defendant's university e-mail account. The parties provided revised proposed search terms to Harvard on December 8, 2020, and are awaiting search reports for those terms, as well as answers to various inquiries concerning the scope and nature of any review Harvard must perform before releasing the emails.

Defendant is in the process of collecting his text messages and investigating the status of messages on his social media accounts.

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Respectfully,

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